

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

KEYSPAN ENERGY DELIVERY
NEW ENGLAND

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) D.T.E. 01-105
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**DIVISION OF ENERGY RESOURCES' SECOND SET OF
INFORMATION REQUESTS**

Instructions

For the purpose of the Massachusetts Division of Energy Resources' ("DOER") Second Set of Information Requests ("Requests"), any reference to the "Company" or "Keyspan" shall mean Keyspan Energy Delivery New England. Any reference to "the Plan" shall mean the Long-Range Resource and Requirements Plan (2001/02 to 2005/6). Any reference to "DSM" shall mean Demand Side Management. Any reference to the "Department" shall mean the Massachusetts Department of Telecommunication and Energy.

DOER requests that Keyspan provide complete and detailed Responses to all Requests and include all relevant documentation with such Responses.¹

Please provide each Response on a separate page with the following:

- 1) a reference to the DTE docket number;
- 2) a recitation of the Request to which Keyspan is responding (including the information request identification/reference number – e.g. DOER 1-1), and;
- 3) the identification, business title, and address of the person responding to the Request.

In order to expedite the review of the Responses, please provide the Responses as they are completed. Please do not wait for the completion of all Responses.

DOER also requests that Keyspan provide supplemental responses to these Requests if Keyspan develops or obtains additional information within the

¹ "Documentation" includes, but is not limited to, writings, drawings, graphs, charts, photographs, phono-records, and other data compilations from which information can be obtained, translated, if necessary, by Berkshire Gas Company, through detection devices, into reasonably useable form.

scope of said Requests subsequent to the provision of Keyspan's initial response and prior to the close of the record in DTE 01-105.

If any of these Requests are ambiguous or need clarification in any way, please notify George Simmons, Division of Energy Resources, at 617-727-4732 ext. 130 in order to clarify the Request(s) prior to the preparing the response.

INFORMATION REQUESTS

DOER 2-1 – Please refer to the Company's response to DOER 1-5. Please identify and submit all relevant Department orders and/or letters that approved each renewed contract and new contract that was submitted and entered into for one year or more. If no such order or letter exists, please explain why.

DOER 2-2 – Please refer to the Company's response to DTE 2-39. Regarding sections (c) - (e) of the Company's response, please specify where in the Department's orders approving the prior supply-plan filings of Boston, Colonial and Essex gas companies it states that the contracts in Section V that were changed or restructured, were approved.

DOER 2-3 – Please refer to the Company's response to DOER 1-9. Do all of the Algonquin and Tennessee contracts provide for primary delivery points to at least one of the Company's Massachusetts city gates?

DOER 2-4 - For the design-day base case, please specify which portion(s) and amounts of the Company's resources make use of alternate receipt or delivery points.

DOER 2-5 – Please refer to the Company's response to DOER 1-15. In determining the Company's resources used to meet the design peak day in the base, high, and HubLine Delay cases, please identify the storage Ratchet(s) used for each scenario? Please explain why this/these ratchet(s) is/are used. Also, if a design peak day occurs late in the heating season and Ratchet II is in effect, please explain how the Company will meet design peak day requirements in each of the above cases.

DOER 2-6 - Please identify and describe the terms and conditions applicable to any natural gas purchased by the Company from its parent entity or any of its affiliates over the last two years. Also, please identify and describe the terms and conditions applicable to any supply it expects to purchase from its parent entity or any of its affiliates over the forecast period that is applicable to the present filing in this proceeding.

DOER 2-7 - Please identify and describe the terms and conditions applicable to any released pipeline capacity purchased by the Company from its parent entity or any of its affiliates over the last two years. Also, please identify and describe the terms and conditions applicable to any released capacity it expects to purchase from its parent entity or any of its affiliates over the forecast period that is applicable to the present filing in this proceeding.

DOER 2-8 – Please refer to the Company’s response to DOER 1-22. Does the phrase “all customers (sales and transportation)”, include both the “grandfathered” and new transportation-only customers that have not been assigned any of the Company’s upstream capacity? Also, please identify how many of the Company’s “grandfathered” and new transportation-only customers have not been assigned any of the Company’s upstream capacity.

DOER 2-9 - Please quantitatively describe the requirements of the “grandfathered” and new transportation-only customers that have not been assigned any of the Company’s upstream capacity on the design peak day in the base case.

DOER 2-10 – Please refer to page 3 of the Plan. The Plan describes the Cape Cod expansion alternatives and the selected expansion option. Did the sendout model used in this decision process include the Hubline Project and the other possible expansions as competing alternatives? If not, please explain why they were not included?

DOER 2-11 – The Plan refers to the amount of “Other Purchased Resources” in the base and HubLine delay cases for the Normal and Design Years. Please distinguish these resources in terms of the following categories: (a) city-gate deliveries; (b) market purchases delivered to the city-gate on Company-owned capacity; and (c) short-term purchases that can be used for transport when necessary.

DOER 2-12 – Please refer to the Company’s response to DOER 1-38. Please explain the phrase, “difference in reliability in relation to specific supply alternatives available in the marketplace at any given time within those categories.” Please rate the “specific supply alternatives available in the marketplace at any given time within those categories” in terms of reliability, from most reliable to least reliable. Also, for each category, please explain how the Company can “guarantee” the level of reliability required by the Company when the deliveries are needed.

DOER 2-13 – Please refer to the Company’s response to DOER 1-40. The Company states that other purchased resources “are generally available in the marketplace at times when the interstate pipeline system is not constrained and at times when the Company is not using its own capacity to draw gas from storage for delivery to the city gate.” In a design year (or very close to design), is it the Company’s experience that the interstate pipeline system is not constrained and the Company therefore does not use its own capacity to draw gas from storage for delivery to the city gate? Please indicate for each of the forecast years the number of days during the design winter in which the Company will need to purchase other resources in the base and Hubline Delay cases.

DOER 2-14 - If the upcoming 2002-03 period results in design conditions, does the Company believe that sufficient “other purchased resources” will be available to serve the 2,372 BBtu of requirements if Hubline is delayed?

DOER 2-15 – Please refer to the Company’s response to DOER 1-45. Please explain any difference in the reliability and availability of gas supplies in TGP’s Zone 1 relative to Zone 4 during both a normal and design winter.

DOER 2-16 - When running the sendout model to determine the optimal resource mix, are DSM measures included as an alternative that can be selected similar to the supply-side resources? If not, please explain why they are not included as an alternative?

DOER 2-17 - Did the Company recall the capacity it had assigned to migrating customers, and then reassign the resulting contracts, when it renewed contracts and entered into its new firm upstream pipeline contracts? If so, please describe the process used to recall the capacity and assign the resulting contracts.

DOER 2-18 – Please refer to the Company's response to D.T.E. 1-67. Do the tables presented in the Response include the requirements for those transportation customers that are exempt from mandatory capacity assignment?

DOER 2-19 – Please refer to the Company's response to D.T.E. 2-6. Does the Company expect to execute the Boundary Contract by April 30, 2002? If not, please provide the date the Company does expect to execute the contract.

DOER 2-20 – Please refer to the Company's response to D.T.E. 2-7. Please describe all instances in which the Boundary Replacement Contract would not require Department approval.

DOER 2-21 – Please refer to the Company's response to D.T.E. 2-18. Please describe the storage capacity and the daily vaporization capacity the abandoned LNG facility would have provided to the Company.